

**IN THE SPECIFICATION**

Applicant (Micron Corp.) has expressed a preference that “of the Invention” language not be used unnecessarily in its cases in light of recent Federal Circuit cases, especially for elements such as the Background that are often intentionally misused in litigation to limit the scope of claim coverage. As no rule exists requiring certain headings be used, applicant declines to amend the headings to reflect the language suggested as preferred, but not required, in MPEP §601(I).